

Statement of Basis
for
Modification of Permit No. WA0040941
South Bend Packers, Inc.
January 2004

Ecology issued this permit on September 17, 2001 and it became effective November 1, 2001. After site inspection and review of South Bend Packers (SBP) processing facility, Ecology believes that the permit needs to be modified to allow a better sampling procedure. Section S6 of the current permit requires SBP to a)plumb all process wastewater from floor drains into a single outfall pipe, and b)install a 24 hour composite sampler to collect samples from this outfall line for TSS and BOD analyses.

Upon further review, Ecology now believes that this approach will not work well for SBP. It is impractical to connect all floor drains to one pipe and then to collect a sample from this pipe. The SBP facility is built on pilings. At some high tides, the water level will be up to the bottom of the floor or higher. To install the new piping, workers would have to use a rowboat during a mid-level tide, and/or deal with tidal mud exposed during low tides. Also, a composite sampler would have some drawbacks for this application; a flow meter is not available to allow flow-proportional sampling, and the effluent is generated in batches, depending on the product being processed, and thus is not able to be collected reliably on a timed basis.

On the other hand, SBP has the ability to collect individual grab samples directly from the floor drain in each processing room. These samples can be collected at specific intervals during the course of a processing day, stored in a cold room, and thus composited into daily samples to send to the analytical laboratory. Hand-collected composite samples will be easier, cheaper, and probably of higher quality than from an automated sampler.

Therefore, Ecology proposes to modify the SBP permit to remove the requirement to install the composite sampler, and to specify that TSS and BOD samples are to be collected as a minimum of four grab samples taken over the course of a processing day. This hand-composited sample will begin to be collected within the first hour of processing, and include a sample collected during cleanup after processing has concluded. Each sample will be collected directly from the floor drains, and will be immediately cooled to ~4° C. On the day of sample collection, samples will be collected from each active processing room. Samples will be collected at least one hour apart, if possible. The composited sample will then be completely mixed and poured into individual containers to be send to the analytical lab, as required by the lab for adherence to proper sample handling protocols.

Ecology will continue to work with SBP to assure they are familiar with the permit requirements and procedures necessary to collect samples that generate high quality data.